

## Remarks

### **1. Summary of the Office Action Mailed July 29, 2004 and Response**

In the Office Action Mailed July 29, 2004, the Examiner stated that claims 1 to 48 are  
5 pending and that the drawings and specification, including the title, are objected to. Of the  
drawings the Examiner (1) objected to figure 1 because the reference elements “110” and “112”  
were used to designate more than one component; and (2) objected to figures 1 and 4 because of  
inconsistencies between figure reference elements and specification designations. In the  
specification the Examiner (1) stated that the title was not descriptive and should be changed to  
10 be clearly indicative of the invention to which the claims are directed; (2) objected to the  
disclosure because of inconsistent font in the specification; and (3) objected to the specification  
as failing to provide proper antecedent basis for the claimed subject matter. Of the claims the  
Examiner (1) objected to claims 30, 33, 34 and 45 due to informal typographical errors; (2)  
rejected claim 18 under 35 U.S.C. § 112 as being indefinite; and (3) rejected claims 1 to 48 under  
15 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,300,947 (Kanevsky).

In response to the above objections and rejections, Applicants have amended claims 1, 3,  
32, 33, 40 and 45 to 48, and have canceled claim 18. Applicants have also amended figures 1  
and 4, and have provided replacement sheets for the amended figures in compliance with 37 CFR  
§ 1.121(d). The specification has also been amended by substitute sheets with the purpose of  
20 correcting minor errors and to bringing the disclosure into congruency with the pending claims.  
Replacement sheets have been provided for the specification towards this purpose in compliance  
with 37 C.F.R. § 1.125(c). Finally, the title of the present application has been changed in order  
to clearly describe the invention to which the claims are directed. No information outside of the

scope of the original disclosure has been added in any current amendments to the disclosure. Now pending are claims 1 to 17 and 19 to 48.

Applicant submits that claims 1 to 17 and 19 to 48 as amended are now currently in condition for allowance, and that claims 1, 29, 36 and 45 are directed to allowable subject matter.

5 Therefore, Applicant requests that claims 2 to 17 and 19 to 28, which are dependent on claim 1; claims 30 to 36, which are dependent on claim 29; claims 37 to 44, which are dependent on claim 36, and claims 46 to 48, which are dependent on claim 45, also be allowed.

After careful review of the pending claims and the cited references, Applicant respectively requests favorable reconsideration in view of the following remarks.

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## **2. Response to the 37 C.F.R. § 1.84(p)(4) Objection to the Drawings**

The drawings were objected to as failing to comply with 37 § CFR 1.84(p)(4), with specific deficiencies being cited in figures 1 and 4. Replacement sheets showing figures 1 and 4 have been provided that reflect the following amendments: in figure 1, Applicants have  
15 renumbered User Agent to element 113 and have renumbered Cookie Handler to 115; and in figure 4, Applicants have changed “Radio Interface” to read “Network Interface.” In addition, the specification has been amended to reflect these reference element numbering changes. The specification has also been amended on page 16, line 13 to read “user agent 113”, and on page 22, line 14 to read “DOM store 124”.

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### **3. Response to the 37 C.F.R. § 1.83(a) Objection to the Drawings**

The specification has been amended to remove incorrect references to figures 12 and 13. Specifically the specification has been amended on page 42, line 19 to read “FIGS. 10 and 11”, and on page 45, line 16 to read “FIG. 12”.

5 Applicants submit that the drawings as currently amended are now in compliance with rules 37 C.F.R. §§ 1.83 and 1.84, and respectfully request acceptance of the drawings by the Examiner.

### **4. Remarks on the Invention Title**

10 As suggested by the Examiner, the title of the invention has been changed to “System and Method for Accessing Customized Information Content Over the Internet Using a Browser For a Plurality of Electronic Devices.” Applicants respectfully submit that the title is now adequately descriptive of the invention.

### **15 5. Remarks on the Disclosure Font**

Applicants submit a substitute specification with this response. A marked-up version of the substitute specification is attached as Appendix A, and a clean version is attached as Appendix B. The specification has been amended so that a consistent font and size are used throughout. Specifically, the content of the table on page 56 has been changed to 12-point Time New Roman  
20 characters. Applicants respectfully request that the objections to the disclosure based on inconsistent font be withdrawn.

## 6. Response to the 37 C.F.R. § 1.75(d)(1) Objection to the Specification

The examiner objected to the specification under 37 C.F.R. § 1.75(d)(1) as failing to provide antecedent basis for claims 3, 4, 7, 23, 25, 34, 35, 37 and 39. In response, applicants have amended the specification to support the above claims in the following manner (all page and paragraph references are with respect to the currently submitted substitute specification sheets):

on page 6, paragraph 3 has been amended by including the phrase “[t]he serializer may also dynamically format the same accessed information or normalized content for a second client side browser”, and on page 19, paragraph 2 has been amended by including the phrase “[t]his client may utilize a markup language different from the client browser 112 of the target electronic device 104”, both in order to support the system of claim 3;

on page 19, paragraph 2 has been amended to support the system of claim 4 by including the phrase “[t]his document may be a complete or partial formatting of the accessed information content by the serializer 128”;

on page 21, paragraph 2 has been amended to support the system of claim 7 by including the phrase “[a]dditionally, the event translator 136 may also manage the transmission of events between the server browser 110 and a second client browser”;

on page 4, paragraph 3 has been amended to support the systems of claims 23 and 35 by including the phrase “[i]n this manner the client browser and server browser work together to access the information content, with the server browser performing a majority of the required tasks”;

on page 20, paragraph 2 has been amended by including the phrase “which also may exist on the client browser 112” to support the system of claim 25 when combined with the content of paragraph 4 on page 22;

on page 20, paragraph 1 has been amended to support the system of claim 37 by including the phrase “[i]n this manner, the event translator 136 can receive accessed information content from the server browser and may then forward at least a portion of the accessed information content to the client browser”;

on page 21, paragraph 1 has been amended to support the system of claim 39 by including the phrase “[a]dditionally, the event translator 136 may also manage the transmission of events between the server browser 110 and a second client browser”.

Applicants submit that claim 34 is completely and adequately covered by the specification in paragraph 3 on page 21 without requiring additional amendment.

In light of the above remarks and amendments, Applicants submit that the specification is currently in condition for acceptance. Therefore, Applicants respectfully request that the above objections to the disclosure and specification be withdrawn.

## **7. Response to the Claim Objections**

Claims 30, 33, 34, and 45 were objected to by the Examiner due to minor typographical errors. In response to the claim objections of the Examiner, the following amendments have been made:

in claim 30, the phrase “pushes transmits” has been changed to “transmits”;

in claims 33 and 34, the typographical error “22.” has been removed;

in claim 45, the typographical error “ana” has been changed to “an”.

Additionally, minor typographical errors were noted and corrected in claims 3, 40, and 45 to 48.

#### 8. Response to the 35 U.S.C. § 112 Claim Rejection

Claim 18 was rejected under 35 U.S.C. § 112 as being indefinite and failing to distinctly point out the claimed subject matter. In response, Applicants have canceled claim 18. Accordingly, the 35 U.S.C. § 112 rejection is moot.

#### 9. Response to the 35 U.S.C. § 102(e) Claim Rejections

The entire claim set, consisting of claims 1 to 48, was rejected under 35 U.S.C. § 102(e) as being anticipated by Kanevsky. Claims 1 and 45 have been amended to more distinctly claim the current invention. Applicants maintain that all currently pending claims of the present invention are now novel over Kanevsky, in consideration of the following remarks.

In claim 1, Applicants describe a system for accessing information content comprising a server browser, client browser, and a serializer for dynamically formatting the accessed information content according to an appropriate markup language for the client browser *and capabilities of the client browser*. Kanevsky teaches a system for accessing information that utilizes a Web Page Adapter Server (WPAS), as opposed to a serializer. As described by Kanevsky, the WPAS is used to “adapt the content of the web pages to the size of the display 113 and also to satisfy the user’s requirements as specified in the display modes message” (Kanevsky: column 7, lines 25 to 28). Given this description, the system as taught by Kanevsky is foremost limited in consideration to a singular aspect of the client hardware (the size of the display) and not to the specification of the client browser, as stated in claim 1 of the current

invention. Likewise, specific examples in the specification of Kanevsky further support limited scope of adaptation to physical aspects of the client machine, specifically display size (Kanevsky: column 7, lines 31 to 33). The adaptation of the web page by the WPAS to the information of the display mode message is, as its name suggests, also generally limited in scope to the specification of display aspects such as window sizes, icon sizes, character sizes, and the like (Kanevsky: figure 5; column 6, lines 21 to 27). The specification of Kanevsky also lists a memory address as an example of information that may be included in the display mode message (Kanevsky: column 6, line 27); however, as specifically described, the memory address information is only utilized in calculating the available memory of the system (Kanevsky: column 6, line 28 to 52), which is a characteristic of the hardware system, and possibly the operating system, not the client browser. As a result, none of these aspects of adaptation performed by the WPAS is directed towards creating a web page transformation compatible with the client browser. The focus of the Kanevsky system, and specifically of the WPAS, is towards the adaptation of web pages to the hardware of the client, and specifically to a particular display size; unlike the present invention, the adaptation is directed towards physical aspects of the electronic device that houses the client, not the client software capabilities. As a result of the above differences, the current invention is distinct and Applicants respectfully submit that claim 1 is novel over Kanevsky.

Dependent claims 2 to 17 and 19 to 28 include more specific variants of the system presented in claim 1 of the current invention. As claim 1 is shown above to be novel over the prior art, Applicants submit that claims 2 to 17 and 19 to 28, which contain more specific embodiments of the invention of claim 1, are also sufficiently shown to be novel over the cited

references. However, several of these claims are further shown to be novel over Kanevsky for additional reasons, as indicated below.

Claim 2 specifies the ability of the serializer to “format information as appropriate for the specific client browser and applications that run on the client browser” (claim 2). As stated in  
5 the response to claim 1 above, Kanevsky does not teach a serializer that formats information according to the specifications of the client browser. In addition, Kanevsky does not teach the adaptation of web pages to the client browser, and it does not teach the adaptation to specific software applications. Therefore, the serializer of the current invention performs a different function than that of the WPAS of Kanevsky. As a result of the above differences, the current  
10 invention as described in claim 2 is further shown to be novel over Kanevsky.

Claim 3 describes the ability of the serializer to format the “information content for a second client browser using a different markup language different from the client browser.” In the specification Kanevsky only describes a configuration of multiple servers, not multiple clients (Kanevsky: column 7, lines 36 to 41). Figure 1 of Kanevsky also does not support a  
15 connection between the WPAS and multiple clients. As a result of the above differences, the current invention as described in claim 3 is further shown to be novel over Kanevsky.

Claim 4 describes the condition where “the serializer formats a portion of the accessed information content...wherein the portion of accessed information content is requested by the client browser.” Kanevsky states that “[t]he transformed set of pages from server 107 are sent to  
20 the server 104, via connection 111a, and then onto the client machine 100 from the server 104”. Therefore, although the display-adapted pages may be packetized for transferal, the entire contents of transformed web pages are transmitted from the server to the client machine. However, as stated by the current invention the entire page may be transformed and stored on the



server, and only those packets that are requested by the client browser are sent. Therefore, the entire transformed web page may or may not be sent to the client. As a result of the above differences, the current invention as described in claim 4 is further shown to be novel over Kanevsky.

5           Claims 5 and 6 add a network between the serializer and the client browser, where the serializer packetizes data for transmission over the network. Kanevsky does not teach the presence of an intermediate network between the serializer and a client browser. Figure 1 of Kanevsky shows a direct connection between the WPAS 107 and the Web Browser (Client) 101 through the Server 104 and Client Machine 103, with no indication of an intermediate network.

10 Kanevsky mentions that although “the invention is illustrated and described in the context of the WWW, the invention may be implemented on other similar networks and/or related networks that comprise the Internet” (Kanevsky: column 4, lines 61-64). However, in this description, the described networks are implied to be a substitute for the WWW, and not as a component of the connection between any analogous serializer and client browser. Furthermore, claims 5 and 6

15 describe the serializer as performing the partitioning of information, not the server. Kanevsky does not describe a partitioning of the translated material at all, nor is it stated that the WPAS has this ability. As a result of the above differences, the current invention as described in claim 5 is further shown to be novel over Kanevsky.

          Dependent claim 7 specifies a system in which the client browser interacts with various

20 other applications. Furthermore, Kanevsky does not at any point describe the ability of the client browser to interact with other applications. The described servers (Kanevsky: column 5, lines 1-4) do not comprise any of the applications specifically discussed in claim 7, nor do these servers

interact with the client browser. As a result of the above differences, the current invention as described in claim 7 is further shown to be novel over Kanevsky.

Dependent claim 8 includes an electronic host for the client browser along with the characteristic that the client browser navigates content according to the abilities of the electronic host and its navigation tools. Additionally, Kanevsky does not teach a serializer or analogous component that formats accessed content according to the specifications of both the client browser and the electronic device, including the navigational tools of the electronic device. As a result of the above differences, the current invention as described in claim 8 is further shown to be novel over Kanevsky.

Dependent claim 9 involves the formatting of dynamically generated content. As stated in the response to claim 1 above, Kanevsky does not teach a serializer that formats information according to the specifications of the client browser. Because the serializer and WPAS are not analogous, the specific system of claim 9 is distinct and is not anticipated by Kanevsky. As a result, Applicants respectfully submit that claim 9 is novel over Kanevsky.

Dependent claim 10 includes the temporary storage of accessed information. In the current invention, the accessed information is “temporarily” stored on the server in order to allow the client browser to request only those portions of the accessed information that are required and can be adequately displayed. Kanevsky implies the “temporary” storage of information only for logistical purposes arising from the need to locally store the accessed information prior to adapting the page (Kanevsky: column 7, lines 25-29). As a result, the two meanings of the word “temporary” in the two cases should not be equivocated. As supported by the current specification of the current invention, the temporary storage of accessed information

is distinct over any described by Kanevsky. As a result of the above differences, the current invention as described in claim 10 is further shown to be novel over Kanevsky.

Dependent claim 11 specifies a system where a requested portion of the accessed information content is temporarily stored by the client browser. While Kanevsky does discuss the storage of “cookies” on the client operating system (Kanevsky: column 7, lines 6-9), he does not indicate that any portion of the information content is stored by the client browser, as in the current invention. As a result of the above differences, the current invention as described in claim 11 is further shown to be novel over Kanevsky.

Dependent claim 16 describes a system where the client browser is hosted on a personal digital assistant (PDA), mobile telephone, or home appliance. Kanevsky states that “the invention is carried out utilizing one or more suitably programmed general purpose computers” (Kanevsky: column 5, lines 40-42). This statement does not specifically indicate the use of a PDA, mobile telephone, or home appliance, none of which is a general purpose computer. Furthermore, none of these devices is included in Figure 1 of Kanevsky. As a result of the above differences, the current invention as described in claim 16 is further shown to be novel over Kanevsky.

Dependent claim 17 presents a system where the client browser can present folderized portions of the accessed information. Kanevsky describes a “module that automatically decides how to fold or expand the content of web pages depending on a size of a screen or window” (Kanevsky: column 2, lines 46-48). The idea of a folded web page in Kanevsky is completely distinct from the folderized portions of accessed information described in the present information. The idea of folded pages, as described by Kanevsky, only refers to a dissection of the content into multiple pages by adding standard links between the pages (Kanevsky: column

9, lines 35-39). This is not the same concept of a hierarchical arrangement of the content into “folders”, as described by the current invention, which allows the inline expansion of the inner content. Furthermore, the “folded” webpages of Kanevsky are simply separate webpages linked together by plain text links; whereas the folderized content may be linked together by in-page expansion points in the current invention. As a result of the above differences, the current invention as described in claim 17 is further shown to be novel over Kanevsky.

Dependent claim 18 has been canceled by the Applicants. Accordingly, the 35 U.S.C. § 102(e) rejection is moot.

Dependent claim 19 is directed towards the ability of the client browser to accept the information content in the form of audio input. Nowhere in Kanevsky is this ability stated, either explicitly or implicitly, as a characteristic of any systems. The statements “the interpreter module 202 receives the web page data” (Kanevsky: column 7, lines 63-63), and “the server adapted web pages URL/CGI data 301 is the web page data received by the client machine 100, over connection 111” do not state nor imply that any audio connection is used. Furthermore, the term “connection 111” is not described by Kanevsky, and there is no evidence present in the specification, claims, or drawings to indicate that an audio connection is used. As a result of the above differences, the current invention as described in claim 19 is further shown to be novel over Kanevsky.

Dependent claims 20 to 21 are directed towards the use of specific markup languages for the client browser and information content, respectively. The claims specifically cite the use of wireless markup language (WML), extensible markup language (XML), and VoiceXML. Nowhere in Kanevsky are the markup languages WML, XML, or VoiceXML discussed. As a

result of the above differences, the current invention as described in claims 20 and 21 are further shown to be novel over Kanevsky.

Dependent claim 22 is directed towards information content comprising unique types of information including image, video, and audio content. Kanevsky only mentions the transfer of URL/CGI data and never mentions the transfer of video and audio content. Furthermore, these types of accessed content are never implicitly discussed in the specification. As a result of the above differences, the current invention as described in claim 22 is further shown to be novel over Kanevsky.

Dependent claim 23 is directed towards the distribution of tasks between the server browser and the client browser, where the server browser performs a majority of the tasks. Kanevsky does not explicitly discuss a division of this sort, nor is there any language that specifically states that the server browser would perform more tasks in accessing the information content than the client browser. Furthermore, Kanevsky states that “a client machine may have more powerful and efficient tools for semantic interpretations than a server machine” (Kanevsky: column 17, lines 12-14), and “such operation may be prohibitively costly for a server machine, since the server needs to process calls from many users and may be burdened if also required to perform display functions more local to the user’s computer” (Kanevsky: column 17, lines 18-21). This implies that the client should perform more tasks in accessing the information than the server, the exact opposite of what is claimed in the current invention. As a result of the above differences, the current invention as described in claim 23 is further shown to be novel over Kanevsky.

Dependent claim 24 is directed towards a server browser that supports code containing scripts in Java Script and Jscript. Kanevsky never discusses Java Script or Jscript in any

capacity, nor does he imply that the server browser is capable of handling Java Script or Jscript code. As a result of the above differences, the current invention as described in claim 24 is further shown to be novel over Kanevsky.

Dependent claim 25 describes the system where the client browser comprises a  
5 microgateway, with other browsers having access to the information content through the microgateway. In the current invention, the microgateway may comprise an “event controller 152 and DOM store 124” (specification, page 23, paragraph 3). The general function of the event controller is described in the following description of a specific embodiment of the present invention: “XML event messages and a proprietary protocol are interpreted by the event  
10 controller 152 to manage data and events to and from the server browser 110” (specification, page 25, paragraph 1). Examples of such events are also provided in the specification of the current invention as “click, blurchange, submit, expand, etc.” (specification, page 25, paragraph 3). However, Kanevsky does not teach at any point a system or system component with the ability to translate such interactive events between the server browser and the client. As a result  
15 of the above differences, the current invention as described in claim 25 is further shown to be novel over Kanevsky.

Dependent claims 27 and 28 describe the addition to the system of an event translator. As described in the specific response to claim 25 above, Kanevsky never discusses a system component that acts in a manner similar to the event translator of the current invention. As a  
20 result of the above differences, the inventions described in claims 27 and 28 are further shown to be novel over Kanevsky.

In claim 29, Applicants describe a system for accessing information content comprising a server browser, client browser, and a serializer for dynamically formatting the accessed

information content according to an appropriate markup language for the client browser *and capabilities of the client browser*, where the desired portions of the stored information content can be navigated by the client browser. As described in the specific response to independent claim 1 above, Kanevsky does not discuss a system component that is analogous to the serializer  
5 of the current invention. Since the system of claim 29 comprises a substantially different system than any system explicitly or implicitly described by Kanevsky, Applicants respectfully submit that the system of claim 29 is therefore novel.

Dependent claims 30 to 35 include variants of the system presented in claim 29 of the current invention. As claim 29 is shown to be novel over the cited references, Applicants submit  
10 that claims 30 to 35, which contain more specific embodiments of the invention of claim 29, are also sufficiently shown to be novel over the cited references. However, several of these claims are further shown to be novel over Kanevsky for additional reasons, as indicated below.

Dependent claim 30 describes the system of claim 29 where the server browser pushes stored information content to the client browser. Pushing data from a server to a client involves  
15 transferring data from the server to the client that is not specifically requested by the client, as is described in the current invention (page 26, paragraph 3). This generally requires an open session to be established between the server and the client. However, Kanevsky never discusses data that is pushed from the server to the client (or vice versa). Instead, all data transmitted to the client from the server is in response to an initial request for that content from the client.  
20 Furthermore, Kanevsky does not discuss the ability of a server to maintain distinct client sessions. As a result of the above differences, the invention described in claim 30 is further shown to be novel over Kanevsky.

Dependent claim 32 discusses the use of events as a means of communication between the client and server. As mentioned in the specific response to dependent claim 25 above, Kanevsky does not teach the use of events in any manner; specifically, Kanevsky does not describe a system where the client and browser communicate using events. As a result of the  
5 above differences, the invention described in claim 32 is further shown to be novel over Kanevsky.

Dependent claim 33 describes a specific system where the client browser comprises a commercially available browser. Kanevsky does not specifically differentiate between browsers and commercially available browsers, as in the current invention, and makes no indication that  
10 the standard browser of the client is commercially available, such as Internet Explorer or Netscape. As a result of the above differences, the invention described in claim 33 is further shown to be novel over Kanevsky.

Dependent claim 34 describes a system where a commercially available browser utilizes a portion of the client browser. As mentioned in the specific response to dependent claim 33  
15 above, Kanevsky does not teach the use of a commercially available browser in any capacity. This indicates that the utilization of the client browser by a commercially available browser is not anticipated. As a result of the above differences, the invention described in claim 32 is further shown to be novel over Kanevsky.

In claim 36, Applicants describe a system for accessing information content comprising a  
20 server browser, client browser, and an event translator for translating a client browser request into an event that is recognizable by the server browser, and where the server browser utilizes the event to access requested information content. Kanevsky states the system protocol for the client to request a web page as follows: “[t]he client 100 sends...a request message 102, conforming to



the URL (uniform resource locator) standard...to a server machine 103...The request message 102 conforming to the URL standard, thus, provides the client with access to web pages which, themselves have URLs embedded therein to provide hypertext links to other pages.” (Kanevsky: column 6, lines 7 to 19) The use of a message that conforms to the URL standard is explicitly stated, and there is no conversion of this message to another form since the URL is directly utilized by the server. As a result, the client request message of Kanevsky is limited entirely to the content of URL addresses. However, the current invention is capable of utilizing a wide variety of client browser request messages, which requires the use of the event translator. The event translator allows information content requests in a variety of forms, which in turn allows the server to provide information for specialized end-user applications (specification, page 12, paragraph 3; page 19, paragraph 3; page 20, paragraph 1; page 21 paragraph 1). This capability is not described by Kanevsky. Since the system of claim 36 comprises a substantially different system than any system explicitly or implicitly described by Kanevsky, Applicants respectfully submit that the system of claim 36 is therefore novel.

Dependent claims 37 to 44 include more specific variants of the system presented in claim 36 of the current invention. As claim 36 is shown to be novel over the cited references, Applicants submit that claims 37 to 44, which contain more specific embodiments of the invention of claim 36, are also sufficiently shown to be novel. However, several of these claims are further shown to be novel over Kanevsky for additional reasons, as indicated below.

Dependent claim 37 describes a system where a portion of the accessed information content received by the event translator is forwarded to the client browser. As indicated in the response to claim 4, the practice of forwarding only a portion of the accessed information while retaining other portions until they are specifically requested is not disclosed by Kanevsky. As a

result of the above differences, the invention described in claim 37 is further shown to be novel over Kanevsky.

Dependent claim 38 describes the use of the event translator to change the accessed information content prior to sending the information content to the client browser. As indicated  
5 above in the specific responses to claims 27, 28 and 36, Kanevsky does not disclose a system with a component analogous to the event translator of the current invention. Additionally, Kanevsky does not teach a system with an analogous event translator that is also capable of changing accessed information content prior to send the information content to the client browser. As a result of the above differences, the invention described in claim 38 is further  
10 shown to be novel over Kanevsky.

In claim 45, Applicants describe a method for accessing dynamic information content that comprises accessing the dynamic information content with a server browser, dynamically formatting desired portions of the information content according to the markup language *and capabilities of the client browser*, transmitting the formatted content to the client browser,  
15 receiving the information at the client browser, and navigating the formatted content. As discussed in the specific response to claim 1, Kanevsky describes the adapting of web content to be compatible with physical limitations of the client, specifically screen sizes and physical memory capacities of the electronic device that houses the client. However, the current invention concerns the formatting of data according to the characteristics and limitations of client  
20 browsers, which involves the consideration of software capabilities. Therefore the scope and application of the method in the current invention is distinct over any system or method described by Kanevsky. As a result, Applicants respectfully submit that the system of claim 45 is therefore novel.

Additionally, dependent claims 46 to 48 include more specific variants of the method presented in claim 45 of the current invention. As claim 45 is shown above to be novel over the cited references, Applicants submit that claims 46 to 48, which contain more specific embodiments of the invention of claim 45, are also sufficiently shown to be novel.

Applicants respectfully submit that all claims of the current invention are novel over the prior art, in view of the current amendments and above remarks. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejections.

### Conclusion

In light of the above amendments and remarks, Applicants submit that the present application is in condition for allowance and respectfully requests notice to that effect. Examiner is respectfully requested to contact Applicants' representative below at (312) 913-3303 if any questions arise or if he may be of assistance to the Examiner.

Respectfully Submitted,

Date: 12/20/04

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